

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: CANNTRUST HOLDINGS INC.  
SECURITIES LITIGATION

No. 1:19-cv-06396-JPO

Judge J. Paul Oetken

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL  
OF PROPOSED CLASS ACTION SETTLEMENTS**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiffs Granite Point Master Fund, LP and Granite Point Capital Scorpion Focused Ideas Fund (“Lead Plaintiffs”), on behalf of themselves and all other members of the proposed settlement class (the “U.S. Settlement Class”), through Court-appointed Lead Counsel Labaton Sucharow LLP, hereby move this Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (e): (i) preliminarily approving eight proposed Settlements, as they relate to the above-captioned class action (the “U.S. Class Action”); (ii) preliminarily certifying the U.S. Settlement Class and appointing Lead Plaintiffs as class representatives and Lead Counsel as class counsel, for purposes of the Settlements, as they relate to the U.S. Class Action only; (iii) approving the form and content of the Notice of Pendency of U.S. Class Action and Proposed Settlements (“Notice”), Claim Form, and Summary Notice, attached as Exhibits 1, 2 and 3 to the proposed Preliminary Approval Order; (iv) finding that the procedures for distribution of the Notice and Claim Form and publication of the Summary Notice constitute the best notice practicable to the U.S. Settlement Class under the circumstances; (v) setting a date and time for the final Settlement Hearing, at which the Court will consider final approval of the Settlements as they relate to the U.S. Action; (vi) appointing Epiq Class Action and Claims Solutions, Inc. to administer the settlement process; and (vi) granting such other and further relief as the Court may deem fair and proper.

This motion is based on the accompanying Memorandum of Law and the Declaration of James W. Johnson, dated August 26, 2021, with annexed exhibits, both filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlements, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlements, with annexed exhibits, is also submitted herewith.

DATED: August 26, 2021

**LABATON SUCHAROW LLP**

/s/ James W. Johnson

James W. Johnson

Michael H. Rogers

David J. Schwartz

James T. Christie

140 Broadway

New York, New York 10005

Telephone: (212) 907-0700

Facsimile: (212) 818-0477

Emails: jjohnson@labaton.com

mrogers@labaton.com

dschwartz@labaton.com

jchristie@labaton.com

*Counsel for Lead Plaintiffs Granite Point  
Master Fund, LP and Granite Point Capital  
Scorpion Focused Ideas Fund, and  
Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 26, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered ECF participants.

/s/ James W. Johnson  
JAMES W. JOHNSON